

EXHIBIT D

UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-CV-01457

**Declaration of Donald S. Zakarin Consenting
to Plaintiff's Motion To Dismiss All Claims
and Allegations Against Lucian Charles
Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group).**

I, Donald S. Zakarin, declare as follows:

1. I am a member of Pryor Cashman, LLP, attorneys for Sir Lucian Grainge, Motown Records and UMG Recordings, Inc. (incorrectly named in the Second Amended Complaint as Universal Music Group). I have personal knowledge of the facts set forth in this Declaration and if called and sworn as a witness, I could and would competently testify thereto.

2. On behalf of Sir Lucian Grainge, Motown Records and UMG Recordings, Inc. (the "UMG Defendants"), as we have repeatedly said from our very first communication with counsel for the Plaintiff on March 4, 2024, there was no basis, not legal and not factual, for the claims and accusations that were alleged in the original complaint, the First Amended Complaint and the Second Amended Complaint. The UMG Defendants should never have been named in

any of these complaints and we should never have been required to make motions to dismiss the complaints in this action.

3. Because Plaintiff and his counsel now belatedly have admitted that there is no basis for the claims and allegations they made against our clients, we therefore consent to and agree that Plaintiff's motion to dismiss with prejudice the Second Amended Complaint as against all of the UMG Defendants should be granted and that the Second Amended Complaint should be amended or deemed amended to strike every reference to Sir Lucian Grainge, Motown Records and Universal Music Group.

4. We consent to such dismissal and amendment or deemed amendment of the Second Amended Complaint to delete all references to the UMG Defendants with full reservation of our clients' rights.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 14, 2024
New York, New York

A handwritten signature in black ink, appearing to read 'Donald S. Zakarin', written over a horizontal line.

Donald S. Zakarin